



**State of New Hampshire  
DEPARTMENT OF ENVIRONMENTAL SERVICES**

6 Hazen Drive, P.O. Box 95, Concord, NH 03302-0095

(603) 271-2900 FAX (603) 271-2456

May 14, 2004



**CERTIFIED MAIL**

**# 7000 1670 0000 0585 8940**

**RETURN RECEIPT REQUESTED**

**NOTICE OF PAST VIOLATION**

Aulson Company, Inc.  
354 Route 108  
Somersworth, New Hampshire 03820

Attn: Mr. Gerry Rancourt, President

**Re: Aulson Company, Inc.  
Somersworth, New Hampshire  
EPA ID # NHD986485670**

Dear Mr. Rancourt

On March 17, 2004, the Department of Environmental Services, Waste Management Division ("DES") conducted an inspection of the Aulson Company, Inc. ("Aulson"). The purpose of the inspection was to determine Aulson's compliance status relative to RSA Ch. 147-A and the New Hampshire Hazardous Waste Rules, Env-Wm 100-1100.

As a result of the inspection and review of the information provided to DES, the following deficiencies were documented:

**1. Env-Wm 509.02(a)(2) – Personnel Training**

Training records provided to DES at the time of inspection, failed to document a training program which includes a list of hazardous waste job titles, job descriptions, descriptions of introductory and continuing training to be provided for each position, and names of employees filling each position.

Env-Wm 509.02(a)(2), which references 40 CFR 265.16, Personnel Training, requires full quantity generators to maintain specific documents and records related to personnel training at the facility.

DES requested that Aulson maintain a written personnel training plan which provides a description of the type and amount of introductory and continuing training that is given to persons filling each hazardous waste related position. DES also requested that Aulson maintain, as part of the program, documents of hazardous waste job titles, job descriptions, and names of employees filling each position and correct any deficiencies identified in the enclosed Hazardous Waste Generator Inspection Report. DES furthermore requested that Aulson submit a copy of this personnel training program to DES.

*In a March 31, 2004 submittal, Mr. Gerry Rancourt, General Manager, provided a personnel training plan detailing hazardous waste job titles, job descriptions, the names of employees filling each position, and a description of the type and amount of introductory and continuing training that is given to persons filling each position. No further action is required.*

2. Env-Wm 509.02(a)(5) – Contingency Plan

At the time of the inspection Aulson's contingency plan was confirmed to be incomplete. Specific deficiencies are listed in the attached Contingency Plan Module.

Env-Wm 509.02(a)(5), which references 40 CFR 265, Subpart D, requires full quantity generators to maintain a complete contingency plan at the site.

DES requested that Aulson revise and update its contingency plan to correct any deficiencies as identified in the enclosed Contingency Plan Module.

*In a March 31, 2004 submittal, Mr. Gerry Rancourt, General Manager, provided documentation demonstrating that Aulson's contingency plan was complete. No further action is required.*

At the time of inspection, according to DES notification records, Aulson had notified as a Full Quantity Generator (>1000 kilograms/ month). However, a review of waste disposal records indicates that Aulson's generator status is that of a Full Quantity Generator (100 - 1000 kilograms/ month). During the inspection, DES requested that Aulson review facility hazardous waste generation rates in order to determine proper generator status; and if necessary, complete and submit a subsequent notification form that accurately reflects the change in generator status.

*In a March 31, 2004 submittal, Mr. Gerry Rancourt, General Manager requested that Aulson remain at LQG status. Mr. Rancourt's request was based on Aulson's anticipated lead abatement projects that have the potential to generate hazardous waste in excess of LQG thresholds. Therefore, no further action is required.*

DES believes the deficiencies identified during the inspection have been corrected and acknowledges receipt of a report describing the corrective measures taken by Aulson to achieve compliance. Accordingly, no further action in response to the listed deficiencies is required. However, DES personnel may reinspect your facility at a later date to determine whether the facility is maintaining full compliance with the applicable rules. Fines may also be pursued for any or all violations observed during this or subsequent inspections of the facility.

Enclosed you will find a copy of the completed Hazardous Waste Generator Inspection Report which documents the compliance status of your facility at the time of the inspection. This checklist may also be of value to you for use in determining future compliance with the New Hampshire Hazardous Waste Rules.

The State of New Hampshire Hazardous Waste Rules, as well as much other useful information, can be obtained from DES's website at <http://www.des.state.nh.us/hwcs/>, or by contacting the Public Information Center at (603) 271-2975.

It is the goal of DES to promote the prevention of pollution at the source as the preferred option for meeting established environmental quality goals. We strive to ensure that pollution prevention options are considered first, followed by recycling, treatment and disposal. I am requesting that the DES's Pollution Prevention Coordinator, Stephanie D'Agostino, contact you to discuss possibilities for waste minimization or source reduction at your facility. In the meantime, if you have immediate questions about pollution prevention, please feel free to contact her at 271-6398.

As a service to New Hampshire's hazardous waste generators, we maintain a Hazardous Waste Assistance Hotline which is available for you to contact our knowledgeable staff of hazardous waste inspectors. Our hazardous waste staff is available to answer your questions concerning the New Hampshire Hazardous Waste Rules and the compliance issues which affect your hazardous waste management program. The technical assistance available through the Hotline includes fact sheets that pertain to the management and recycling of specific wastes, summary sheets of specific sections of the Hazardous Waste Rules, copies of EPA and New Hampshire hazardous waste policy or regulatory interpretation letters that may benefit your operation, and networks with other state or federal agencies to answer your questions on a national level. The Hotline is available Monday through Friday, 8:00 AM to 4:00 PM toll free at (866) HAZ-WAST (in-state only) or at (603) 271-2942.

If you believe that the deficiencies documented in this NOPV have been cited in error, or if you have any questions regarding this letter, please contact the lead inspector, Eric K. Abrams or John J. Duclos, Supervisor of the Hazardous Waste Compliance Section at 271-2942. Specific questions regarding water related issues may be directed to Mary Jane Meier of DES's Water Division at 271-5553, and for air related issues, please contact Pam Monroe of DES's Air Resources Division at 271-1370. Thank you for your cooperation.

Sincerely,



Kenneth W. Marschner, Administrator  
Waste Management Programs  
Waste Management Division

cc: DB/RCRA/NOPV/Archives  
Anthony P. Giunta, P.G., Director, Waste Management Division  
Gretchen R. Hamel Esq., Administrator, DES Legal Unit  
Joan Ryan, E H& S Coordinator, Aulson Company, Inc.  
John Geary, Vice President, Aulson Company, Inc.

E-mail: JJD/MM/SD/PM

Enclosure: Inspection Modules